

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THE CHICAGO BEARS FOOTBALL CLUB,  
INC. and NATIONAL FOOTBALL LEAGUE  
MANAGEMENT COUNCIL,

Plaintiffs,

-against-

MICHAEL HAYNES, JOE ODOM, CAMERON  
WORRELL and NATIONAL FOOTBALL  
LEAGUE PLAYERS ASSOCIATION,

Defendants.

Case No.: 11-cv-02668

Judge: Hon. Elaine E. Bucklo

Magistrate Judge: Hon. Michael T. Mason

**PLAINTIFFS' MOTION FOR CONTEMPT**

Plaintiffs' The Chicago Bears Football Club, Inc. and National Football League Management Council, by their undersigned counsel, move this Court to enter an order of contempt against individual Defendants Michael Haynes, Joe Odom, and Cameron Worrell (the "Players") based on their violation of this Court's September 13, 2011 Order. Plaintiffs' respectfully request this Court enter an order holding the Players in civil contempt and award sanctions as set forth in the accompanying memorandum of law.

Dated: October 12, 2011

Respectfully submitted,

/s/ Rex S. Heinke

Rex S. Heinke (*Pro hac vice* granted)

L. Rachel Helyar (*Pro hac vice* granted)

Johanna R. Shargel (*Pro hac vice* granted)

AKIN GUMP STRAUSS HAUER & FELD LLP

2029 Century Park East, Suite 2400

Los Angeles, CA 90067

Telephone: 310.229.1000

Facsimile: 310.229.1001

Daniel L. Nash (*Pro hac vice* granted)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
1333 New Hampshire Avenue, N.W.  
Washington, DC 20036  
Telephone: 202.887.4000  
Facsimile: 202.887.4288

Elizabeth A. Kaveny – ARDC #6211280  
BURKE WISE MORRISSEY & KAVENY  
161 N. Clark, Suite 2240  
Chicago, IL 60601  
Telephone: 312.580.2040  
Facsimile: 312.580.2041

*Attorneys for the Chicago Bears Football Club, Inc.  
and the National Football League Management  
Council*